## GWOU ADMINISTRATIVE RECORD SECTION TITLE: GW-800-801-1.06





## St. Charles County Government

Department of Community Health and the Environment Gif Copies, Director Division of Environmental Services Mike Duvati, Director

August 15, 2000

Mr. Stephen H. McCracken, Project Manager Weldon Spring Site Remedial Action Project 7295 Highway 94 South St. Charles, MO 63304

Re: Comment Period for Proposed Plan for Remedial Action for Groundwater Operable Unit #1 at Weldon Spring Site

Dear Steve:

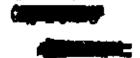
Is response to the comment period for the proposed plan for remedial actions at WSSRAP, and to SEPA's May 12, 2000 final decision regarding the dispute resolution process, St. Charles County existence of Environmental Services appreciates the opportunity to offer the following guidance and osition.

oundwater to predict how certain remedies would actually perform. We would like to see full insideration given to estimating restoration potential of the groundwater. We feel the information escented in the MDNR-DGLS document prepared by Dr. Jim Williams dated March 10, 2000 scussing the premature termination of pump testing in October of 1998 provides compelling ionale for reconsideration of the proposed treatment of the remaining groundwater contamination, a concur with the stated MDNR position on the subject.

e Remedial Investigation and Feasibility Study is a guide process and subject to interpretation by stakeholders. EPA-Region Seven states (EPA, Dennis Grams, 05-12-06, 4/3, ref. which neediation to choose) interprets the RIFS guidelines as "not to exhaust all avenues for data period define performance of a remedial alternative. Rather, its purpose is to gather sufficient diams states this was not achieved by DOE during its investigation period. We believe this ibility at WSSRAP.

also request that full consideration be given to on-site post-construction management and long stewardship issues. This plan should exist as a proactive detailed design, more so than a ingent, reactive response. The stewardship plan should identify all parties responsible for ardship activity, local office locations and describe their control obligations including activity frame projected for the foreseeable future.

201 North Second Street • Suile 433 • St. Charles, MO 83301 Phone: 636-949-7415 • Fax: 636-949-7519



St. Charles County, along with the State, is also interested in future damage assessments and compensation for injuries to natural resources at and beyond the WSSRAP site. The County is in a position to act as one of the Trustees for the State, if so needed, and welcomes DOE's commitment to meeting the requirements of the Natural Resources Damages Act following cessation of remediation activities.

We appreciate the extensive time and effort spent in compiling the information presented to us and look forward to a proposed groundwater remediation and stewardship plan that reflects the best interests of the public and environment of St. Charles County. We likewise acknowledge and commend DOE on the overall remedial WSSRAP progress completed and documented to date.

Sincerely,

SHE for MO M. Duvall

Mike Davall, CHMM

Director, Division of Environmental Services

MD/MH/sit

Joe Ortwerth, County Executive ce:

Gil Copley, Director, St. Charles County Department of Community Health and the Environment Robert Gelfer, Federal Facilities Section Chief, MDNR-HWMP

Glenn Hackey, Chair, Weldon Spring Citizens Commission